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DEC 15 2006

Serial No. 09/804667  
Docket No. 37168-82320

IN THE CLAIMS

Please amend the claims under 37 C.F.R. § 1.121(c) as set forth below.

17. (currently amended) A computerized method of administering an annuity product having a withdrawal feature and a guarantee comprising the steps of:

a) establishing an annuity account having an owner and a unitized account value the investment performance of which accrues to the benefit of the account owner and from which withdrawals can be made;

b) inputting data relating to the annuity account, including data relating to at least one of the account owner, the account value, and a specified [maximum] withdrawal rate for a given withdrawal frequency;

c) allowing the account owner to make withdrawals from the annuity account in amounts which are one of:

1. greater than the specified withdrawal rate, up to and including the entire account value; and

2. less than or equal to the specified withdrawal rate; and

[c) **paying withdrawals to the account owner and deducting amounts of the withdrawals from the account value; and]**

d) providing a guarantee that, even if the entire account value is exhausted before the end of a specified time period, amounts up to the specified[said maximum] withdrawal rate will continue to be paid for at least said specified time period, provided that withdrawals before the account value is exhausted are in accordance with step c(2)[do not exceed the maximum withdrawal rate];

wherein said specified time period is determined when the account is established to be at least one of a lifetime period, a period of a certain number of months or years, and a

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period required for cumulative withdrawals to at least equal a specified percentage of one of the account value as of a specified date and a highest account value achieved as of a specified date following establishment of the annuity account.

18. (previously presented) The method of Claim 17, wherein said specified time period is a lifetime period.

19. (previously presented) The method of Claim 17, wherein said specified time period is a period independent of the lifetime of the account owner.

20. (previously presented) The method of Claim 17, wherein said specified time period is a period during which withdrawals at least equal one of a specified percentage of the account value as of a specified date, and a specified percentage of a highest account value achieved as of a specified date following establishment of the annuity account.

21. (previously presented) The method of Claim 17, wherein said guarantee provides for a return to the account owner of a specified percentage of the account value as of a specified date.

22. (previously presented) The method of Claim 17, wherein said step of inputting data includes inputting data relating to at least one of an attained age of the account owner and a gender of the account owner.

23. (currently amended) The method of Claim 17, wherein a maximum amount of said withdrawal[s] permitted in accordance with step c(2) [under the guarantee] for the given withdrawal frequency is determined by multiplying said specified [maximum] withdrawal rate and the account value as of a specified date.

24. (currently amended) The method of Claim 17, wherein a maximum amount of said withdrawal[s] permitted in accordance with step c(2) [under the guarantee] for the given withdrawal frequency is determined by multiplying said specified [maximum] withdrawal rate

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and a highest account value achieved as of specified date following establishment of the annuity account.

25. (previously presented) The method of Claim 17, wherein a maximum amount of said withdrawals permitted in accordance with step c(2) [under the guarantee] is periodically redetermined.

26. (previously presented) The method of Claim 17, wherein upon death of the account owner, the account value, if any, is paid to a designated account beneficiary.

27. (previously presented) The method of Claim 17, wherein upon the death of the account owner, a specified percentage of the initial account value is paid to a designated account beneficiary.

28. (previously presented) The method of Claim 17, wherein upon the death of the account owner, a specified percentage of the account value, if any, as determined on a specified date following establishment of the annuity account, is paid to a designated account beneficiary.

29. (previously presented) The method of Claim 17, wherein upon the death of the account owner, a specified percentage of the initial account value, less withdrawals, is paid to a designated account beneficiary.

30. (currently amended) The method of Claim 17, further comprising the step of altering the terms of the guarantee if said withdrawals exceed the specified [maximum] withdrawal rate.

31. (cancelled)

32. (previously presented) The method of Claim 17, further comprising the step of establishing a charge to pay for the guarantee.

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33. (previously presented) The method of Claim 32, wherein the step of establishing a charge to pay for the guarantee comprises assessing a periodic fee and deducting the fee from the account value.

34. (previously presented) The method of Claim 32, wherein the step of establishing a charge to pay for the guarantee comprises adding an increment to an asset charge.

35. (previously presented) The method of Claim 17, wherein the account value is periodically redetermined, absent additional deposits and excess withdrawals, as follows:

$$\text{Account Value}_{t+1} = (\text{Account Value}_t - \text{Withdrawal}_t) \times (1 + i)$$

where:

$\text{Account Value}_{t+1}$  = Account value at time t+1

$\text{Account Value}_t$  = Account value at time t

$\text{Withdrawal}_t$  = dollar amount of variable withdrawal benefit at time t

i = actual fund performance during period t to t+1 (as a %).

36. (previously presented) The method of Claim 17, wherein said given withdrawal frequency is per year.